

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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: Case No.: 1:23-cv-04033-LJL
Aaron Abadi,
: **DECLARATION OF LOUISE-HÉLÈNE**
Plaintiffs, : **SÉNÉCAL IN SUPPORT OF AIR**
: **CANADA’S MOTION TO DISMISS**
-against- :
American Airlines Group, Inc., *et al.*, :
Defendant. :
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I, LOUISE-HÉLÈNE SÉNÉCAL, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.

2. I am the Vice-President & General Counsel - Litigation of Air Canada with a business address of 7373 Cote Vertu Road West, Saint-Laurent, Province of Quebec, Canada and have been employed in the Air Canada Legal Department since June 12, 1989.

3. My duties and responsibilities include managing all major litigation by or against Air Canada and its subsidiaries across the world and provide general legal advice to Air Canada.

4. I submit this Declaration in support of Air Canada’s Motion to Dismiss.

5. I am familiar with the facts and allegations contained in Plaintiff’s Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge and/or my review of the records of Air Canada that are created and maintained in the regular course of its business.

6. Air Canada is a corporation organized and existing under the laws of Canada engaged in the business of the carriage by air of passengers, baggage and cargo.

7. Air Canada maintains its headquarters and principal place of business in Montreal, Province of Quebec, Canada.

8. Air Canada has never maintained a principal place of business in any state in the United States, including New York or Texas. In fact, by its constituting law, the *Air Canada Public Participation Act*, Air Canada is required to maintain its Head Office in the Montreal Urban Community area.

9. Exhibit 30 of the Plaintiff's Complaint are November 9, 2021 and November 12, 2021 e-mails from Air Canada Customer Relations to Aaron Abadi.

10. At all times relevant to the Complaint, Air Canada's Executive Centre, Customer Relations was, and currently is, located in Calgary, Province of Alberta, Canada and Air Canada's Call Center Medical (MEDA) Desk was and currently is located in Montreal, Province of Quebec, Canada.

11. According to Air Canada's records, Aaron Abadi did not:

- a) make a reservation for travel on an Air Canada flight between November 2021 and the present;
- b) enter into or purchase a contract of carriage for travel on an Air Canada flight between November 2021 and the present; and
- c) did not travel on any Air Canada flight between November 2021 and the present.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 27th of December 2023

A handwritten signature in blue ink, appearing to read "Louise-Hélène Sénécal", written over a horizontal line.

LOUISE-HÉLÈNE SÉNÉCAL